



November 6, 2012

Mr. Partap Lall
On-Scene Coordinator
Emergency Response Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

**Subject: Removal Action Letter Report
 S&K Hand Tools Site RV
 Defiance, Defiance County, Ohio
 Technical Direction Document No. TO-01-12-05-1005
 OTIE Contract No. EP-S5-10-10**

Dear Mr. Lall

Oneida Total Integrated Enterprises (OTIE) has prepared this Removal Action Letter Report in accordance with the requirements of the U.S. Environmental Protection Agency (U.S. EPA) Technical Direction Document (TDD) No. TO-01-12-05-1005 issued under the Superfund Technical Assessment and Response Team (START) Contract No. EP-S5-10-10. The scope of this TDD was to provide oversight and removal support during the removal action at the S&K Hand Tools Site (Site) in Defiance, Defiance County, Ohio. Under this TDD, START was tasked to provide removal oversight, conduct health and safety monitoring, and maintain removal documentation under the direction of the U.S. EPA On-Scene Coordinator (OSC), Partap Lall. Elisa Walker was the START Project Manager and Santino Nardulli was the team member for this removal action.

This removal action report summarizes the Site background; discusses the premise for the removal action; and details the removal activities, including the health and safety monitoring, analytical data, and waste disposal. The attachments for this report include Site Figures (Enclosure 1), a Photographic Log of the Site (Enclosure 2); Waste Manifests (Enclosure 3); and hazardous waste categorizing (HazCat) Spreadsheets (Enclosure 4).



Site Background

S&K Hand Tools is located at 135 Hickory Street in Defiance, Defiance County, Ohio. The geographical coordinates of the Site building are 41°16'49.39" North latitude and - 84°20'21.85" West longitude (Figure 1 – Site Location Map). The Site is located in a populated area surrounded by both commercial and residential properties. The Maumee River is located approximately 1/3rd mile north of the Site and the Auglaize River is located approximately 1 mile west of the Site.

S&K Hand Tools conducted manufacturing operations involving metal plating and polishing. All operations at the Site were shut down sometime in July 2010. S&K Hand Tools' Corporate Headquarters is in operation and is located in Sycamore, Illinois. The Ohio EPA Site records indicate that S&K Hand Tools Company in Defiance, Ohio was served a "Cessation of Regulated Operations (CRO)" which expired on April 15, 2011. S&K Hand Tools failed to comply with the CRO and several containers of waste remained at the Site. The facility is not secured and there have been recent reports of vandalism. The local county commissioners had expressed concerns regarding the potential release of waste off-site.

Premise for the Removal Action

On November 30, 2011, OSC, Brian Kelly, and OTIE START members Naren Babu and Elisa Walker mobilized to the Site, met with former S&K Hand Tools employee Kirk Etzler, and performed a Site Assessment (SA). SA activities included site reconnaissance, field screening, and the collection of liquid drum samples. The SA report noted that drums and containers of various sizes were observed inside the Site building with no secondary containment. Broken doors, shattered glass, and trash throughout the building indicated trespassing and vandalism. There was no electricity in the building, and observations during the site reconnaissance indicated unsafe conditions including low visibility, collapsed walls, holes and openings in the floors and walls, and open tank areas. Two 35-gallon drums, 85 55-gallon drums, and several small containers were found near the west end of the shipping area of the facility (Figure 2 – Site Features Map). Eleven small polyethylene (poly) drums and 21 drums of 55-gallon capacity were observed in the east end of the shipping area. Some of the blue poly 55-gallon drums had labels of "MURIATIC ACID 22° BE", "HYDROCHLORIC ACID 20 BE", "SODIUM BISULFATE LIQUID 40%", and "SULFURIC ACID 66°BE" all accompanied by "corrosive" labels. A 55-gallon drum labeled with a "water soluble degreasing solvent" manufactured by "CHEMSEARCH" was located in the plating facility. Several blue poly drums labeled with Class "9" placards indicating "Miscellaneous Dangerous Goods" were observed on the south side of the dock. These drums were also labeled with

yellow and red hazardous waste labels with U.S. EPA Waste Numbers F006 and D007. In addition to the drums and containers, two vertical 3,000-gallon tanks with unknown contents were observed outside of the facility building and adjacent to the east wall of the plating room.

Analytical results of samples collected during the SA were evaluated against the criteria of characteristics of hazardous waste [40 Code of Federal Regulations (CFR), Sections 261.20 through 261.24]. Drums and containers containing highly basic compounds, acidic compounds, and ignitable materials were observed in the Site building which posed a threat of release. The presence of hazardous material in this unsecured building posed a threat to nearby residents through direct exposure since the Site exhibited signs of vandalism. Several drums posed a high threat of fire or explosion based on the flammable nature of the drums. The SA Report indicated that the existing conditions at the Site supported a removal action to abate threats to human health and the environment.

Site Removal Activities

The U.S. EPA initiated a removal action in May 2012 to abate threats to human health and the environment posed by uncontrolled hazardous substances at the Site. The U.S. EPA, Emergency and Rapid Response Services (ERRS) contractor Environmental Quality Management, and START contractor, OTIE, mobilized to the Site on May 29, 2012 to conduct removal action activities. The removal activities included mobilization, hazardous waste sampling and characterization, hazardous and non-hazardous waste consolidation and disposal, decontamination, and demobilization.

Site Mobilization and Work Area Setup

ERRS mobilized a removal crew including Response Manager (RM), William (Bill) Poma, Field Cost Administrator (FCA), Susan Thuillard, and two subcontractor crew members from Inland Waters of Ohio (Inland). At the beginning of the removal activities, the RM conducted a health and safety meeting by reviewing the Site-specific Health and Safety Plan (HASP), and discussed health and safety requirements for conducting removal action activities. A hospital route map was placed in every on-site vehicle and posted near the exit of the command field trailers (trailers). U.S. EPA and contractors reviewed and signed the HASP. START began compiling Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) paperwork, including daily Site entry/exit logs and daily work orders.

Beginning on May 29, 2012, health and safety meetings were conducted at the beginning of each work day by the RM to discuss Site hazards, exposure risks, and daily work tasks; U.S. EPA, START, and ERRS participated in the daily meetings. In addition to these meetings, START implemented an air monitoring program as part of the health and safety requirements during all removal activities. Air monitoring ensured: the personal protection of those on and off-site; appropriate Personal Protective Equipment (PPE) and engineering controls were implemented at all times.

From May 29, 2012 to May 31, 2012, ERRS conducted infrastructure set up activities, which included the installation of two Site trailers with electrical connection, established a contamination reduction zone, placed yellow caution tape around walking hazards such as holes in floors and hanging pipes, and established Site roadways. The trailers were located west of the facility along Hickory Street which also served as a support area. Hot zones were established intermittently in portions of the warehouse and chemical storage areas depending on daily activities. Site contamination reductions zones (CRZ) were established inside the southwest portion of the facility near the main entrance (Enclosure 2 – Photo #1) and south of the drum storage area (Figure 3 – Site Zone Map). Additional setup activities conducted during this period included: setup of portable restroom facilities and roll-off boxes, and preliminary staging and sorting of drums and small containers in the storage area of the facility (Enclosure 2 – Photo #2). Composite samples were collected from the former chrome plating and polishing areas to identify the potential nature of hazardous materials and debris. Samples were analyzed at ALS Laboratory Group (ALS) in Holland, Michigan for Toxicity Characteristic Leaching Procedure (TCLP) volatile organic compounds (VOCs), TCLP semi-volatile organic compounds (SVOCs), TCLP metals, pH, flashpoint, reactive cyanide, and reactive sulfide. Results indicated that the material and debris in the former plating and polishing areas were non- hazardous.

On May 31, 2012, OSC Lall conducted a contingency plan meeting for the Site. Attendees included Defiance County Sheriff, David Westrick, South Richland Fire Department Chief, Bob Lehman, Superintendent of Water Pollution Control, Mark Lehnert, Assistant Superintendent of Water Pollution, Control Kristi Babcock, START, and RM Poma. The contingency plan meeting addressed emergency and/or incident releases that could potentially arise during U.S. EPA removal activities. The contingency plan, prepared by START, discussed mitigative actions to be undertaken to prevent actual or potential harm to human health and the environment during the Site's removal action. Upon completion of site activities on May 31, 2012, U.S. EPA, START, and ERRS crew members demobilized and returned back to continue with the removal activities on June 4, 2012. Chronological Narrative of Removal Actions

During the week of June 4, 2012, the ERRS crew continued initial set-up activities that included the installation of the safety shower, mobilization of additional equipment and the cleanup and disposal of minor oil spilled areas throughout the facility. Staging, segregation, and numbering occurred on all containers and drums that measured 5-gallons or greater in size prior to sampling. A total of 248 drums and containers were staged in the storage area. Additional containers which were considered Resource Conservation and Recovery Act (RCRA) empty as defined under Title 40 of the Code of Federal Regulations (CFR) Section 261.7(b) (1) were collected and crushed or cut depending on material makeup, and stored of in roll-off boxes for later disposal (Enclosure 2 – Photo #3).

The two 3,000 gallon steel tanks (T-0249, T-0250) located outside of the facility were assessed in order to conduct preliminary field screening tests. Access holes were cut into the two tanks and field screening tests were conducted which indicated the green residue solids inside the tanks had a neutral pH. The materials remaining inside the tanks were suspected to be green nickel solids and filled <1/4th capacity of the tanks. START recorded the results of the preliminary tests in the log book and conducted work zone air monitoring using the MultiRAE during these activities; no readings registered above background levels. During this week, the crew continued cutting empty poly containers, crushing empty metal containers and debris, and placing solid material into non-hazardous roll-off boxes. The vertical sand filter located north of the T-0249 and T-0250 tanks was dismantled and loaded into a non-hazardous roll-off box for later disposal.

Beginning on June 6, 2012, ERRS chemist, Mark Douglas, and START screened the staged drums and containers in level B PPE to determine the level of protection needed for future sampling. START conducted screening activities in both the headspace of the drums, and the surrounding breathing zones with the MultiRAE; results were recorded in the log book. Non-detect levels were observed in the surrounding breathing zones while screening levels peaked at 900 ppm for CO, 200 ppm for H₂S, 695 ppm for VOCs, and 20 ppm for LEL in the headspace of the drums. Based on the results, Betsy Nightingale, alternate OSC, approved downgrading further sampling and related activities involving the drums or its contents to level C PPE. Drum/container sampling (Enclosure 2 – Photo #4) and HazCat tests by the ERRS crew began on June 6, 2012, and continued throughout the rest of the week. HazCat tests were conducted in modified level C PPE under a fume hood with exhaust fan (Enclosure 2 – Photo #5) that vented the fumes to the outside of the building. The HazCat area was located west of the main entrance in the former tool room/die sink area. Based on the HazCat test results, acid liquids, base liquids, caustic solids, flammable liquids, grease, latex paint, neutral liquids, oil-based paint, sodium bisulfate,

and solid waste streams were identified and segregated. ERRS crew members recorded the results of the HazCat analysis on drum/container inventory log forms. Throughout these activities, START conducted work zone personal protective air monitoring as well as perimeter air monitoring using the MultiRAE instrument; no readings registered above background levels.

During the week of June 11-15, 2012, the ERRS chemist completed HazCat analysis of all drum samples and consolidated the contents of small containers. The drums in the warehouse were segregated and organized by waste stream. Samples from each container were used to test compatibility within each waste stream, and additional material was collected from some of the drums to create bulk composite samples in a 5-gallon bucket. Analytical samples were collected from each of the bulk waste streams; the corresponding sample IDs included “Acid Liquids”, “Base Liquids”, “Caustic Solids”, “Flammable Liquids”, “Grease”, “Latex Paint”, “Neutral Liquids”, “Paint (Oil-based)”, “Sodium Bisulfate”, and “Solids”. Waste disposal profile samples of Acid Liquids, Base Liquids, Solids, Neutral Liquids, and Flammable Liquids were submitted to ALS for chemical analysis. Table 1 shows the analyses conducted on each of the profile samples, while Table 2 summarizes the analytical results. Once analytical results were received, drum/container contents were consolidated (Enclosure 2 – Photo #7) into their respective waste streams, and the newly generated RCRA empty drums/containers were loaded into a non-hazardous roll-off box for future disposal. Consolidated drums/containers were then staged by waste streams in the northwest portion of the facility in the storage area.

Table 1
Waste Stream Description Summary
S&K Hand Tools Removal Action
Defiance, Defiance County, Ohio

Waste Stream Sample ID	Analyses
Acid Liquid	TCLP VOCs, TCLP SVOCs, TCLP Metals, pH, Flashpoint
Base Liquid	TCLP VOCs, TCLP SVOCs, TCLP Metals, pH, Flashpoint, Reactive Cyanide, Reactive Sulfide, Total Cyanide
Solid	TCLP VOCs, TCLP SVOCs, TCLP Metals, pH, Flashpoint, Reactive Cyanide, Reactive Sulfide
Neutral Liquid	TCLP VOCs, TCLP SVOCs, TCLP Metals, pH, Flashpoint, Reactive Cyanide, Reactive Sulfide
Flammable Liquid	TCLP VOCs, TCLP SVOCs, TCLP Metals, pH, Flashpoint, PCBs, Total Halogens

Notes:

ID- Identification of waste stream
PCBs- Polychlorinated biphenyls
TCLP- Toxicity Characteristic Leaching Procedure
VOCs Volatile Organic Compounds
SVOCs Semi-Volatile Organic Compounds

Table 2
Waste Stream Analytical Results
S&K Hand Tools Removal Action
Defiance, Defiance County, Ohio

Waste Stream	Acid Liquids	Base Liquids	Solids	Neutral Liquids	Flammable Liquids
pH Analysis	1.15	13.9	2.50	8.30	8.78
Flashpoint (°F)	>200	>200	>200	>200	>200
Total Cyanide (mg/L)	NA	ND	NA	NA	NA
Reactive Cyanide (mg/L)	NA	ND	ND	ND	NA
Reactive Sulfide (mg/L)	NA	ND	ND	ND	NA
TCLP Metals (mg/L)*					
Arsenic	0.024	0.15	0.089	ND	ND
Barium	5.1	0.38	0.20	0.13	0.058
Cadmium	0.050	2.5	0.010	0.0024	0.0051
Chromium	3.3	0.074	0.58	16	0.085
Lead	0.11	0.15	ND	0.043	1.5
Mercury	0.15	ND	ND	ND	ND
Selenium	0.10	2.9	0.035	ND	ND
Silver	ND	ND	ND	ND	ND
TCLP VOCs (µg/L)	ND for all parameters	ND for all parameters	ND for all parameters	ND for all parameters	ND for all parameters
TCLP SVOCs (µg/L)	ND for all parameters	ND for all parameters	ND for all parameters	ND for all parameters	ND for all parameters
Total Halogens in wt. %	NA				1.0
PCBs (mg/Kg)	NA				ND

Notes:

ND – concentration in sample was below laboratory detection limit

NA – not applicable: the given waste stream was not analyzed for the given parameter

* - Maximum Concentration for Toxicity Characteristic (mg/L): Mercury 0.2, Arsenic 5.0, Barium 100, Cadmium 1.0, Chromium, 5.0, Lead 5.0, Selenium 1.0, Silver 5.0

°F – Degrees Fahrenheit

mg/L – milligrams per liter

µg/L – micrograms per liter

wt. % - weight percentage

mg/Kg – milligram per kilogram

The contents of tanks T-0249 and T-0250 were stabilized and collected in non-hazardous roll-off boxes. These emptied tanks were cut in half with a sawzall saw, fully dismantled (Enclosure 2 – Photo #6), and stored in an on-site roll-off box for later disposal as a RCRA empty container. An approximately 1,000-gallon rectangular poly tank (T-0251) located outside the facility on the south portion of the former forging area was preliminary screened and HazCat sampled in order to determine its contents. Once the screening and sample results determined its contents to be rainwater, holes were drilled and cut into the tank in order to expel the liquid and render it unusable. During the sampling and drilling activities, START conducted work zone air monitoring using the MultiRAE; no readings registered above background levels.

Beginning June 15, 2012, ERRS began cleaning activities in the former heat and treat, polishing, and plating areas. The heat and treat room was broom swept, and the residual material was mixed with a drying material (Floor-dry) for stabilization and disposal (Enclosure 2 – Photo #8). With the aid of a skid steer, any remaining hardened floor material was then scraped and mixed with the above residual material. Large piping and duct work was cut out from the former polishing and plating areas (Enclosure 2 – Photo #9), and debris was also removed and consolidated with the rest of the debris from other areas of the Site. Based on the results from the earlier obtained samples, the waste and debris were characterized for disposal as non-hazardous waste and were stored in non-hazardous roll-off boxes for future disposal. During cleaning activities, the crew donned level C PPE and START conducted both work zone and perimeter air monitoring with the MultiRAE. No readings above background levels were observed during monitoring activities. On June 15, 2012 one 30 cubic yard roll-off box containing RCRA empty containers and debris was sent to National Serv-All Non-Hazardous Waste Landfill in Fort Wayne, Indiana for land disposal.

During the week of June 18-22, 2012, the ERRS crew continued and completed broom sweeping, and consolidation activities in the heat and treat, polishing, and plating areas. Beginning June 18, 2012 and concluding on June 19, 2012, oil based paint, latex paint and grease waste streams were over-packed into one cubic yard lined hazardous box HazBox waste containers (Enclosure 2 – Photo #10). Drums categorized in the flammable or neutral waste streams that contained solid/liquid mixtures were temporarily segregated in order to filter out the solids and to ensure successful pumping activities. Once isolated, Floor-dry was added to the removed solids for stabilization and disposal. The newly formulated Floor-dry/solid mixtures were collected in roll-off boxes. Similarly, the contents of an 85 gallon steel, rectangular, tank (T-0222) was also stabilized and collected in the roll-off box. The two ERRS crew

members from Inland were demobilized at the end of this week due to the progression and near completion of removal activities. Roll-off boxes containing RCRA empty containers and debris were filled and shipped to National Serv-All Non-Hazardous Waste Landfill for land disposal on June 19, 2012 and June 20, 2012.

During the week of June 25-28, 2012, the ERRS crew completed the removal of hazardous and non-hazardous materials from the Site and segregating them in roll-off boxes and drums for disposal. On June 25, 2012 the crew staged the flammable drums and containers in the polishing room for pumping and disposal. Flammable liquid was pumped from each individual drum directly into a tanker. A total of 2,004 gallons of flammable liquid waste was pumped and transported to Petro-Chem Processing Group (Petro-Chem) treatment and disposal facility located in Detroit, Michigan for fuel blending. Crew members donned modified level C PPE during pumping activities. After the conclusion of pumping activities, the crew cut all empty poly containers, crushed empty metal containers, and collected the newly generated RCRA empty material in roll-off boxes. START conducted air monitoring with the MultiRAE throughout the course of pumping, and container crushing and cutting activities; no readings were observed above background levels.

The hazardous Neutral Liquid waste stream totaling 2,106 gallons was similarly pumped out from each individual drum or container staged in the polishing room (Enclosure 2 – Photo #11). The hazardous liquid was then transported by tanker truck to Dynecol, Inc. Treatment Plant (Dynecol) in Detroit, Michigan for treatment disposal. RCRA empty containers resulting from these pumping activities were cut, crushed and collected in roll-off boxes. During cleaning and disposal activities, START conducted work zone and perimeter air monitoring; no readings above background levels were observed. On June 27, 2012 the previously over-packed oil paint, latex paint and grease waste streams along with the bulk grouped waste streams Acid liquids, Bases liquids, and Solids were loaded onto a semi-truck and shipped to Dynecol for disposal (Enclosure 2 – Photo #12).

At the conclusion of these activities, the ERRS crew swept the rust-stained floor outside the oil room and collected all abandoned fluorescent light bulbs at the Site. The accumulated bulbs were packaged and sent for recycling through Waste Management's LampTracker® Program. A power washer was mobilized to the Site to decontaminate ERRS equipment using pressurized water. The skid steer, fork lift, and hand tools were decontaminated in the outdoor area, east of the facility. ERRS crew donned modified level C PPE during all decontamination activities.

Site Demobilization

After disposal and cleanup activities concluded on June 28, 2012, the emergency shower was dismantled and all personal belongings/equipment were collected and packed. Trailers were emptied and cleaned while rental equipment was staged outside the facility for pickup. ERRS crew members with the exception of the FCA demobilized after the conclusion of the day's activities. On June 28, 2012 U.S. EPA and START led a final post removal action walkthrough of the Site with Bob Lehman, Kristi Babcock and Assistant Chief Bowling of the Defiance Fire Department. The post removal action walkthrough and meeting allowed for questions to be asked and removal activities to be explained. Later in the day, the trailers, portable restrooms, and rental equipment were picked up by the rental companies. The final roll-off box containing RCRA empty containers and debris was picked up and shipped to National Serv-All Non-Hazardous Waste Landfill for land disposal. U.S. EPA, START and the ERRS crew (FCA) demobilized from the Site.

Waste disposal

Waste from Site removal action was classified and disposed as hazardous and non-hazardous wastes depending upon analytical results and waste disposal criteria. ERRS coordinated with transportation and disposal facilities and arranged for waste disposal. Table 3 summarizes wastes disposed from the Site.

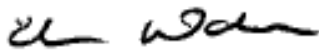
Summary

The S&K Hand Tools removal action was conducted from May 29, 2012 through June 28, 2012. During this removal action, START provided U.S. EPA with technical support in monitoring on-site activities, provided ERRS contractor oversight, and collected and documented Site information.

The removal action began on May 29, 2012, with mobilization to the Site. Site conditions were assessed, work areas were established and on-site health and safety was addressed. Containers were gathered from throughout the Site building, staged in the storage area, and sampled for HazCat analysis. Based on the results of the HazCat analysis, separate waste streams were bulked and either shipped or pumped out in a tanker for disposal. Three tanks containing non-hazardous residual material or liquid were emptied, and the contents were disposed of at National Serv-All Non-Hazardous Waste Landfill located in Fort Wayne, Indiana. The tanks were cut open and rendered unusable. RCRA empty containers were cut and crushed prior to disposal in roll-off boxes. Approximately 90 cubic yards of RCRA empty containers, off-

specification material, and debris were disposed of as non-hazardous special waste at National Serv-All Non-Hazardous Waste Landfill. Two boxes of fluorescent light bulbs were sent for recycling through Waste Management's LampTracker® Program. Approximately 4,100 gallons of non-hazardous flammable oil and neutral liquid waste was sent to Petro-Chem and Dynecol, both located in Detroit, Michigan. The remaining Acids, Bases, Grease, Latex Paint, Oil-based Paint, and Solids waste streams were over-packed or tight-wrapped and shipped for disposal to Dynecol on June 27, 2012. On June 28, 2012 U.S. EPA and START held a final post-removal action walkthrough and debriefing meeting with the City of Defiance, and South Richland Fire Department officials. After the completion of the walkthrough, U.S. EPA, START and ERRS demobilized from the Site on June 28, 2012. At the completion of the removal action, the threat of release of hazardous substances to surrounding populations was abated.

Sincerely,



Elisa Walker
Project Manager, OTIE

Enclosure 1: Figures
Enclosure 2: Photographic Log
Enclosure 3: Manifest
Enclosure 4: HazCat Spreadsheets

cc: Raghu Nagam, OTIE START Program Manager

Table 3
Waste Disposal Summary
S&K Hand Tools Removal Action
Defiance, Defiance County, Ohio

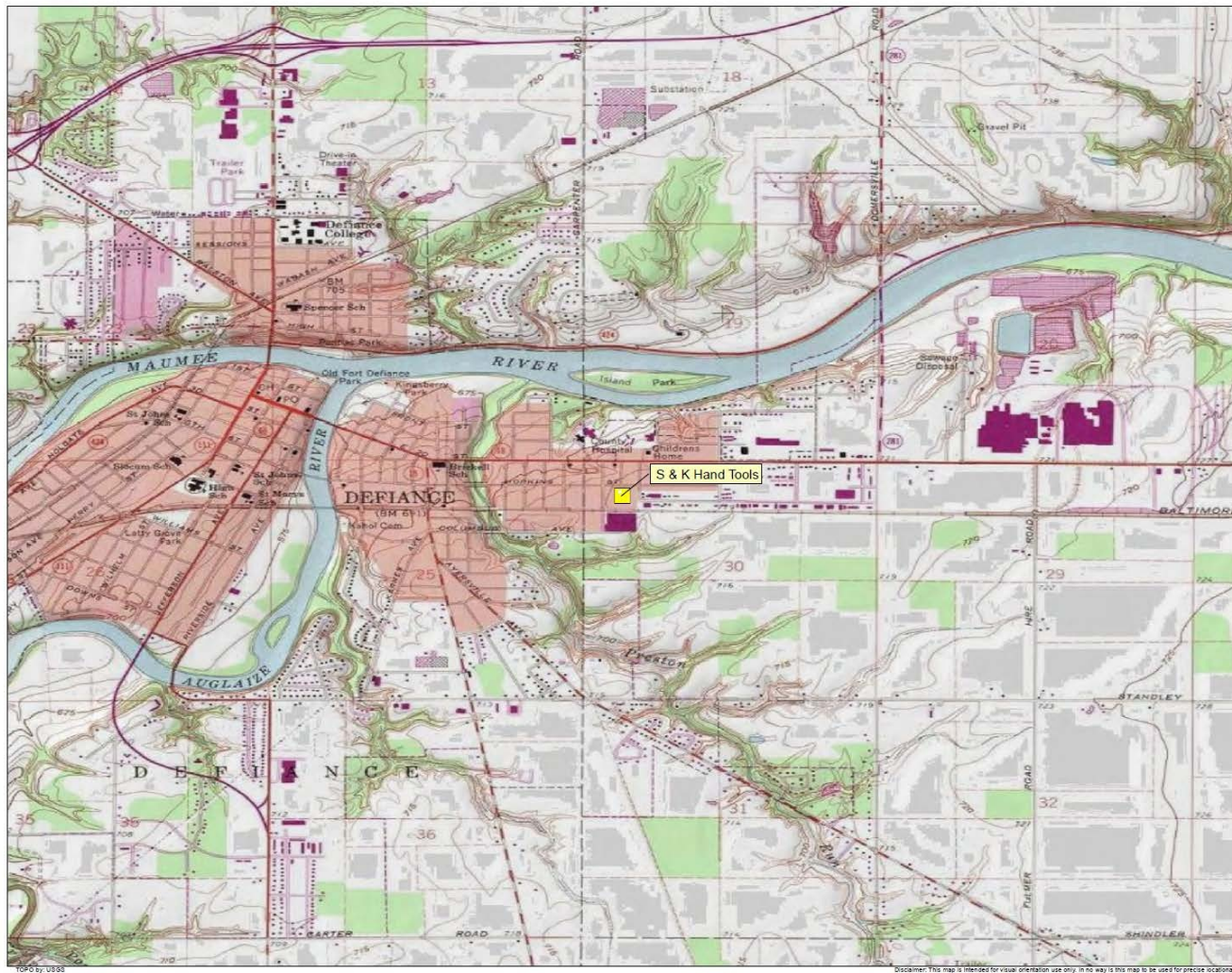
Waste Category	Quantity	Date Shipped	Manifest Number	Disposal Method	Facility, Location
1. Hazardous Waste Liquid, Neutral Liquids Bulk	2,106 gal.	6/27/12	009654979 JJK	Treatment	Dynecol, Inc. Treatment Plant 6520 Georgia St. Detroit, MI. 48211
1. RQ, Waste Paint related material	800 lb.	6/27/12	009654980 JJK	Disposal	Dynecol, Inc. Treatment Plant 6520 Georgia St. Detroit, MI. 48211
2. RQ, Waste Corrosive Liquid, Basic (Base Liquids - Corrosive)	110 gal.			Treatment	
3. RQ, Waste Hydrochloric Acid	275 gal.			Treatment	
4. RQ, Waste Sulfuric Acid	220 gal.			Treatment	
1. Non-hazardous waste liquid (latex paint)	1,000 lb.	6/27/12	009654981 JJK	Disposal	Dynecol, Inc. Treatment Plant 6520 Georgia St. Detroit, MI. 48211
2. Non-hazardous waste solid (sodium metabisulfite)	750 lb.			Treatment	
3. Non-regulated material (Grease)	2,000 lb.			Disposal	
4. RQ, Bisulfites, aqueous solutions (Sodium Bisulfite 40%)	55 gal.			Treatment	
1. RQ, Sodium Hydroxide, solid	55 gal.	6/27/12	009654982 JJK	Treatment	Dynecol, Inc. Treatment Plant 6520 Georgia St. Detroit, MI. 48211
1. Toxic waste liquid (M-Tolylidene Diisocyanate)	40 lb.	6/6/12	010008982 JJK	Treatment	Petro-Chem Processing Group 421 Lycaste Detroit, MI, 48214
2. Non DOT Regulate Material (Oil and Water)	2,004 gal.	6/25/12	010011811 JJK	Treatment	Petro-Chem Processing Group 421 Lycaste Detroit, MI, 48214
1. Four 30 cubic yd. RCRA Roll-off Boxes	120 cubic yd.	6/15, 6/19, 6/20, 6/28	NA	Disposal	National Serv-All Non-Hazardous Waste Landfill 6231 MacBeth Road Fort Wayne, IN 46809

Notes:
RQ – Reportable Quantity
lb. – pound
gal. - gallon

ENCLOSURE 1

FIGURES

(3)



Legend

■ Site Location

Note:
USGS Topo Quadrangle
USGS-QD-ID: 41084-C3
Quad Name: Defiance East
Date Published: 1980

0 Feet 2,000 4,000

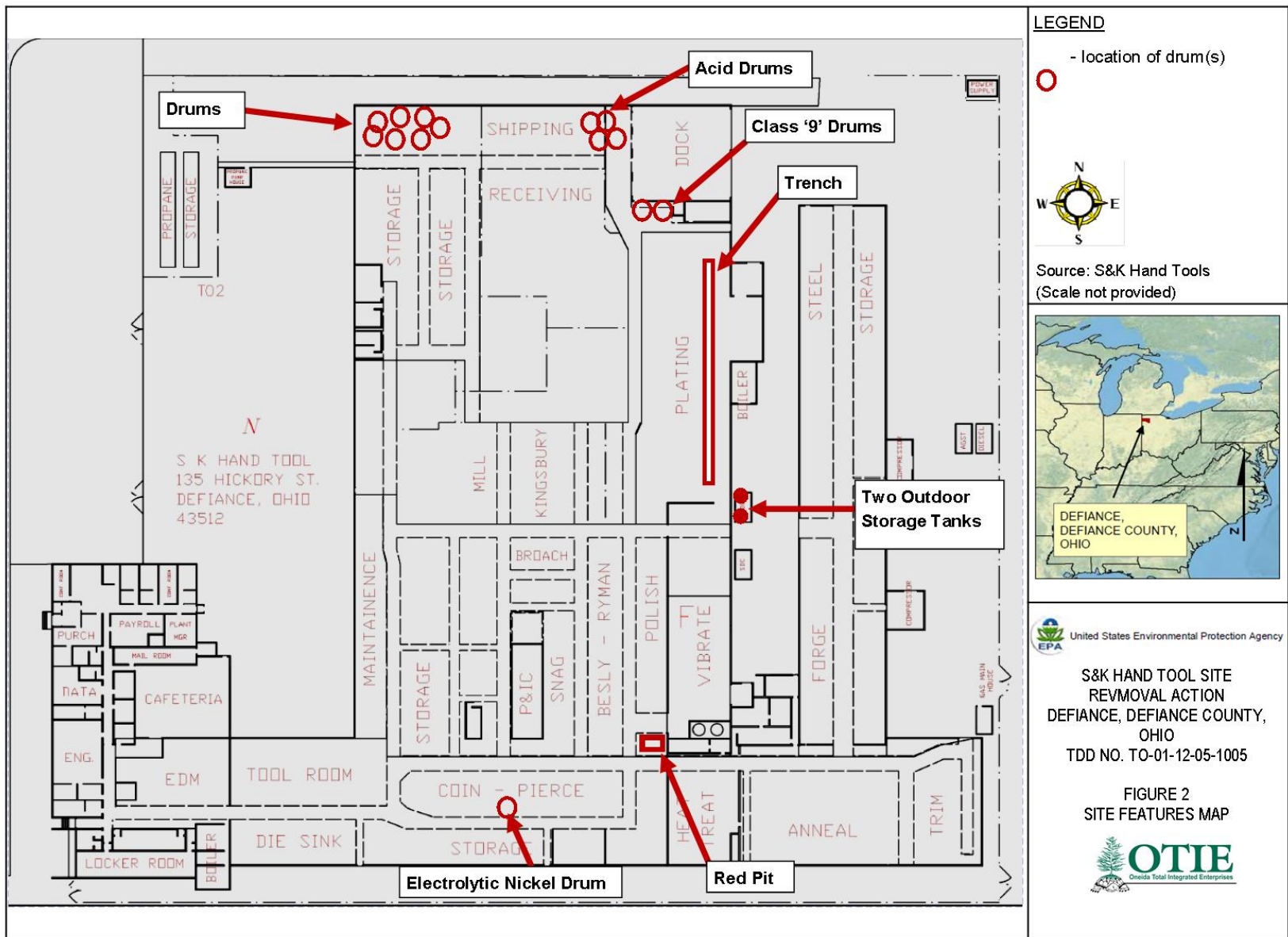


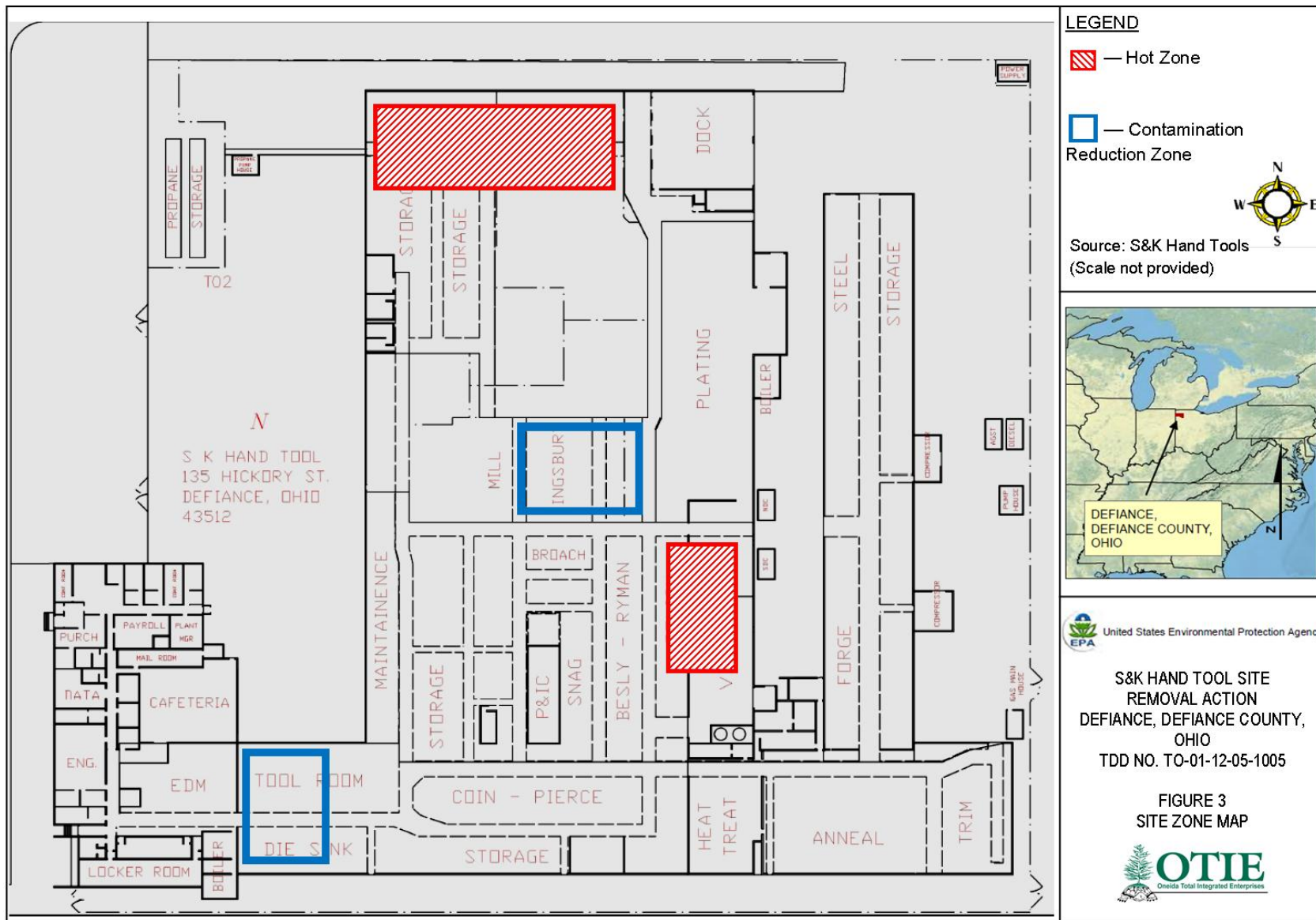
United States Environmental Protection Agency

S&K HAND TOOLS SITE
REMOVAL ACTION
DEFIANCE, DEFIANCE COUNTY,
OHIO
TDD NO. TO-01-12-05-1005

FIGURE 1
SITE LOCATION MAP







ENCLOSURE 2
PHOTOGRAPHIC LOG
(6 Pages)

Photograph No.: 1 **Photographer:** Santino Nardulli **Orientation:** Northeast
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** May 31, 2012
Site Name & Location: S&K Hand Tools Site Trailers and parking lot, site building in the background.



Photograph No.: 2 **Photographer:** Santino Nardulli **Orientation:** West
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** May 31, 2012
Site Name & Location: Preliminary organization and staging of drums and small containers in storage area.



Photograph No.: 3 **Photographer:** Santino Nardulli **Orientation:** East
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 5, 2012
Site Name & Location: ERRS disposing of empty drums and small containers near former polishing area.



Photograph No.: 4 **Photographer:** Santino Nardulli **Orientation:** North
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 6, 2012
Site Name & Location: ERRS collecting hazcat samples in level C PPE from staged drums while START conducts air monitoring.



Photograph No.: 5 **Photographer:** Santino Nardulli **Orientation:** North
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 8, 2012
Site Name & Location: ERRS' chemist conducting hazcat analysis inside laboratory fume hood while START conducts air monitoring.



Photograph No.: 6 **Photographer:** Santino Nardulli **Orientation:** West
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 11, 2012
Site Name & Location: ERRS disposing of 3,000-gallon tanks located outside of former plating area while START conducted air monitoring.



Photograph No.: 7 **Photographer:** Santino Nardulli **Orientation:** West
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 13, 2012
Site Name & Location: ERRS consolidating drums after waste streams and secondary staging was completed.



Photograph No.: 8 **Photographer:** Santino Nardulli **Orientation:** East
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 15, 2012
Site Name & Location: ERRS cleaning the former heat and treat room of various oil spills and stains while START conducted air monitoring.



Photograph No.: 9 **Photographer:** Santino Nardulli **Orientation:** Northwest
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 15, 2012
Site Name & Location: ERRS cleaning and disposing of debris in the former polishing room while START conducted air monitoring.



Photograph No.: 10 **Photographer:** Santino Nardulli **Orientation:** North
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 18, 2012
Site Name & Location: ERRS over-packing oil based paints for shipment and disposal while START conducted air monitoring.



Photograph No.: 11 **Photographer:** Santino Nardulli **Orientation:** East
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 27, 2012
Site Name & Location: ERRS pumping neutral liquids in modified Level C PPE from 55-gallon drums while START conducted air monitoring.



Photograph No.: 12 **Photographer:** Santino Nardulli **Orientation:** Northeast
TDD Number: TO-01-12-05-1005 **Contract:** EP-S5-10-10, OTIE **Date:** June 27, 2012
Site Name & Location: ERRS loading previously over-packed waste streams for shipment to Dynecol Detroit, Inc.



ENCLOSURE 3
WASTE MANIFEST
(9 Pages)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OH0045247350	2. Page 1 of 1	3. Emergency Response Phone (313) 571-7141	4. Manifest Tracking Number 009654979 JJK						
5. Generator's Name and Mailing Address USEPA/ SK HAND TOOLS 135 HICKORY STREET DELIANCE, OH 43512				Generator's Site Address (if different than mailing address)							
Generator's Phone:				U.S. EPA ID Number MID074259565							
6. Transporter 1 Company Name Dynacol, Inc.				U.S. EPA ID Number							
7. Transporter 2 Company Name				U.S. EPA ID Number							
8. Designated Facility Name and Site Address Dynacol, Inc. - Treatment Plant 6320 Georgia St. Detroit, MI 48211 Facility's Phone: (313) 571-7141				U.S. EPA ID Number MID074259565							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes			
				No.	Type						
	X	1. HAZARDOUS WASTE LIQUID, N.O.S., 9, RA3082, III		001	TT	2106	g	D007			
		2.									
		3.									
	4.										
14. Special Handling Instructions and Additional Information 1. #0006 - NEUTRAL LIQUIDS (BULK) TL/2 325											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name				Signature				Month	Day	Year	
								6	27	12	
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name				Signature				Month	Day	Year
	MIKE TLINT								6	27	12
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name				Signature				Month	Day	Year
	18. Discrepancy										
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
	Manifest Reference Number: _____ U.S. EPA ID Number _____										
18b. Alternate Facility (or Generator)											
Facility's Phone: _____											
18c. Signature of Alternate Facility (or Generator)								Month	Day	Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. H077		2.		3.		4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name				Signature				Month	Day	Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OND045247350		2. Page 1 of 1		3. Emergency Response Phone (313) 571-7141		4. Manifest Tracking Number 009654980 JJK							
		5. Generator's Name and Mailing Address USEPA/ SK HAND TOOLS 135 HICKORY STREET DELIANCE, OH 43512								Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name Dynecol, Inc.		U.S. EPA ID Number MD074259565													
7. Transporter 2 Company Name		U.S. EPA ID Number													
8. Designated Facility Name and Site Address Dynecol, Inc. - CME 6520 Georgia St. Detroit, MI 48211		U.S. EPA ID Number MD074259565													
Facility's Phone: (313) 571-7141															
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes					
	X	1. EQ, Waste Paint related material, 2, UN1263, II				X01- CF		X900-	P	D001					
	X	2. EQ, Waste Corrosive liquid, basic, inorganic, n.o.s., 8, UN3266, III, (Sodium Hydroxide, Cadmium)				X02- DF		X110-	G	D002 D006 D010					
	X	3. EQ, Waste Hydrochloric acid, 8, UN1789, II				X05- DF		X275-	G	D002					
	X	4. EQ, Waste Sulfuric acid, 8, UN1830, II				X04- DF		X270-	G	D002					
14. Special Handling Instructions and Additional Information 1. #174764J (OIL BASE PAINTS) 2. #174766 (BASE LIQUIDS - CORROSIVE) 3. #174770 (HYDROCHLORIC ACID) 4. #174771 (SULFURIC ACID 66 laume')															
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.															
Generator's/Officer's Printed/Typed Name PC Call						Signature PC Call		Month Day Year 16 12 11 12							
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____														
	Transporter signature (for exports only): _____														
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials														
	Transporter 1 Printed/Typed Name Robert L. Farnsworth						Signature [Signature]		Month Day Year 16 12 11 12						
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name						Signature		Month Day Year						
18. Discrepancy															
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection															
Manifest Reference Number: _____															
18b. Alternate Facility (or Generator)						U.S. EPA ID Number									
Facility's Phone: _____															
18c. Signature of Alternate Facility (or Generator)										Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)															
1. H141				2. H077				3. H077				4. H077			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a															
Printed/Typed Name						Signature		Month Day Year							

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OH0045247350		2. Page 1 of 1		3. Emergency Response Phone (313) 571-7141		4. Manifest Tracking Number 009654981 JJK			
		5. Generator's Name and Mailing Address USEPA/ SR HAND TOOLS 135 HICKORY STREET BRIANCE, OH 43512								Generator's Site Address (if different than mailing address)	
Generator's Phone:											
6. Transporter 1 Company Name Dynecol, Inc.		U.S. EPA ID Number MTD074259565									
7. Transporter 2 Company Name		U.S. EPA ID Number									
8. Designated Facility Name and Site Address Dynecol, Inc. - CMF 6520 Georgia St. Detroit, MI 48211		U.S. EPA ID Number MTD074259565									
Facility's Phone: (313) 571-7141											
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		1. Non-hazardous waste liquid				201- CF 100-		P		029L	
		2. Non-hazardous waste solid				X015- BA 750-		P		029L	
		3. Non-regulated material				X02- CF 2,000-		P		029L	
		4. RQ, Bisulfite, aqueous solutions, H.C.S., 6, UN2693, III				X01- DF 155-		G		029L	
14. Special Handling Instructions and Additional Information 1. #174769 (LATE PLANT) 2. #174769 (SODIUM METABISULFITE) 3. #174767 (GELASE) 4. #174768 (SODIUM BISULFITE 40%)											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Officer's Printed/Typed Name K. Call						Signature K. Call		Month Day Year 16 27 12			
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____										
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Robert L Fensholt Signature Robert L Fensholt Month Day Year 06 27 12 Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____										
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____ Facility's Phone: _____										
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____										
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H111 2. H141 3. H141 4. R077										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name _____ Signature _____ Month Day Year _____											

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OH0045247350		2. Page 1 of 1		3. Emergency Response Phone (313) 571-7141		4. Manifest Tracking Number 009654982 JJK							
		5. Generator's Name and Mailing Address USARPA / SH HAND TOOLS 125 HICKORY STREET DEFLANCH, OH 43512								Generator's Site Address (if different than mailing address)					
GENERATOR		6. Transporter 1 Company Name Dynacool, Inc.						U.S. EPA ID Number MID074259565							
		7. Transporter 2 Company Name						U.S. EPA ID Number							
DESIGNATED FACILITY		8. Designated Facility Name and Site Address Dynacool, Inc. - CMF 6520 Georgia St. Detroit, MI 48211						U.S. EPA ID Number MID074259565							
		Facility's Phone: (313) 571-7141													
TRANSPORTER		9a. HM				9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity		12. Unit Wt./Vol.		13. Waste Codes	
INT'L		14. Special Handling Instructions and Additional Information 1. #174772 (50BK CLEAN 747 (Sodium Hydroxide Solids))													
		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.													
TRANSPORTER		Generator's/Officer's Printed/Typed Name K. Call				Signature <i>[Signature]</i>				Month Day Year 16 12 7 11					
		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				Port of entry/exit: Date leaving U.S.:									
DESIGNATED FACILITY		17. Transporter Acknowledgment of Receipt of Materials													
		Transporter 1 Printed/Typed Name Robert L. Fawcett				Signature <i>[Signature]</i>				Month Day Year 16 12 7 12					
DESIGNATED FACILITY		Transporter 2 Printed/Typed Name				Signature				Month Day Year					
		18. Discrepancy				18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				Manifest Reference Number:					
DESIGNATED FACILITY		18b. Alternate Facility (or Generator)						U.S. EPA ID Number							
		Facility's Phone:													
DESIGNATED FACILITY		18c. Signature of Alternate Facility (or Generator)										Month Day Year			
		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)													
DESIGNATED FACILITY		1. H141		2.		3.		4.							
		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a													
DESIGNATED FACILITY		Printed/Typed Name				Signature				Month Day Year					

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number QHD045247350		2. Page 1 of 1		3. Emergency Response Phone (877) 577-2669		4. Manifest Tracking Number 010008982 JJK				
		5. Generator's Name and Mailing Address USEP / SK HAND TOOL 9311 GROH ROAD GROSSE ILE MI 48138 (734)692-7685						Generator's Site Address (if different than mailing address) USEPA / SK HAND TOOL 135 HICKORY STREET DEFIANCE OH 43512 (734)692-7685				
6. Transporter 1 Company Name NORTRU, LLC		U.S. EPA ID Number MID021087275										
7. Transporter 2 Company Name		U.S. EPA ID Number										
8. Designated Facility Name and Site Address PETRO-CHEM PROCESSING GROUP 421 Lycaste		U.S. EPA ID Number MID980615298										
Facility's Phone: Detroit, MI 48214 (313) 824-5840												
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	1. UN2810 WASTE TOXIC, LIQUIDS, ORGANIC, N.O.S. (N-TOLYLIDENE DIISOCYANATE) 6.1 PGIII				1 DF		40	P	U158	U223	
		2.										
		3.										
		4.										
14. Special Handling Instructions and Additional Information (1) 544316-00 - ER6(153) ISOCYANATE AND 2,2-D												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offor's Printed/Typed Name PC Cell						Signature <i>[Signature]</i>		Month Day Year 16 6 12				
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____											
	17. Transporter Acknowledgment of Receipt of Materials											
TRANSPORTER	Transporter 1 Printed/Typed Name						Signature		Month Day Year			
	Transporter 2 Printed/Typed Name						Signature		Month Day Year			
DESIGNATED FACILITY	18. Discrepancy											
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
	Manifest Reference Number: _____											
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____											
	Facility's Phone: _____											
18c. Signature of Alternate Facility (or Generator) Month Day Year												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. H141		2.		3.		4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name						Signature		Month Day Year				

GENERATOR

**NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST**

If waste is asbestos waste, complete Sections I, II, III and IV
If waste is **NOT** asbestos waste, complete Sections I, II and III

I. GENERATOR (Generator completes Ia-s)

a. Generator's US EPA ID Number		b. Manifest Document Number		c. Page 1 of 1	
d. Generator's Information: USEPA – SK Handtools Site 135 Hickory Street Defiance, OH 43512 f. Phone: 734-692-7685 h. County of Site Location: Defiance County, OH Generator site location (if different):			e. Billing Information: (Billing/Pricing is handled between Environmental Quality Management & the Republic Roll-Off Hauling Division) g. Phone: 513-309-3062 (Environmental Quality Management) j. Phone No.:		
k. Waste Profile #	l. Exp. Date	m. Waste Shipping Name and Description	n. Containers No. Type	o. Total Quantity	p. Unit Wt/Vol
3764 12 9433	6 / 6 / 2013	RCRA Empty Containers and Debris		Roll-Off	
3764 12 9816	6 / 7 / 2013	Floor Sweepings and Debris	1	Roll-Off	30 CY
GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if this waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions. I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR 268 and is no longer a hazardous waste as defined by 40 CFR 261.					
X <i>Beloff</i>		X <i>Beloff</i>		6-20-12	
q. Generator Authorized Agent Name (Print)		r. Signature		s. Date	

II. TRANSPORTER (Generator completes IIa-b and Transporter completes IIc-e)

a. Transporter's Name and Address: National Serv-All Hauling Division 6231 MacBeth Road Fort Wayne, IN 46809 b. Phone: 260-478-0377		
c. Driver Name (Print)	d. Signature <i>Beloff</i>	e. Date 6/20/12

III. DESTINATION (Generator complete IIIa-c and Destination Site completes IIId-g)

a. Disposal Facility and Site Address: National Serv-All Landfill (Republic Services) 6231 MacBeth Road Fort Wayne, IN 46809 (Allen County) b. Phone: 260-478-0374		c. US EPA Number – N/A IDEM Approval Number – 02-02	d. Discrepancy Indication Space:
I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.			
e. Name of Authorized Agent (Print)	f. Signature	g. Date	

IV. ASBESTOS (Generator completes IVa-f and Operator complete IVg-i)

a. Operator's Name and Address: THIS SECTION IS NOT APPLICABLE (NOT ASBESTOS)		c. Responsible Agency Name and Address: THIS SECTION IS NOT APPLICABLE (NOT ASBESTOS)	
b. Phone:		d. Phone:	
e. Special Handling Instructions and Additional Information:			
f. <input type="checkbox"/> Friable <input type="checkbox"/> Non-Friable <input type="checkbox"/> Both % Friable % Non-Friable			
OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.			
g. Operator's Name and Title (Print)		h. Signature	
		i. Date	
*Operator refers to the company which owns, leases, operates, controls, or supervises the facility being demolished or renovated, or the demolition or renovation operation or both			



NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

If waste is asbestos waste, complete Sections I, II, III and IV
If waste is **NOT** asbestos waste, complete Sections I, II and III

I. GENERATOR (Generator completes Ia-s)

a. Generator's US EPA ID Number		b. Manifest Document Number		c. Page 1 of 1		
d. Generator's Information: USEPA – SK Handtools Site 135 Hickory Street Defiance, OH 43512 f. Phone: 734-692-7685 h. County of Site Location: Defiance County, OH Generator site location (if different):			e. Billing Information: (Billing/Pricing is handled between Environmental Quality Management & the Republic Roll-Off Hauling Division) g. Phone: 513-309-3062 (Environmental Quality Management)			
i. Site Location:			j. Phone No.:			
k. Waste Profile #	l. Exp. Date	m. Waste Shipping Name and Description	n. Containers No.	Type	o. Total Quantity	p. Unit Wt/Vol
3764 12 9433	6 / 6 / 2013	RCRA Empty Containers and Debris	1	Roll-Off	15	YD.
3764 12 9816	6 / 7 / 2013	Floor Sweepings and Debris	1	Roll-Off	15	YD.

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if this waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions. I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR 268 and is no longer a hazardous waste as defined by 40 CFR 261.

x	PC Lall	x	PC Lall	6-
q. Generator Authorized Agent Name (Print)	r. Signature	s. Date		

II. TRANSPORTER (Generator completes IIa-b and Transporter completes IIc-e)

a. Transporter's Name and Address: National Serv-All Hauling Division 6231 MacBeth Road Fort Wayne, IN 46809 b. Phone: 260-478-0377		
c. Driver Name (Print)	d. Signature	e. Date
Kent Moor	Kent Moor	6-28-12

III. DESTINATION (Generator complete IIIa-c and Destination Site completes IIId-g)

a. Disposal Facility and Site Address: National Serv-All Landfill (Republic Services) 6231 MacBeth Road Fort Wayne, IN 46809 (Allen County) b. Phone: 260-478-0374	c. US EPA Number – N/A IDEM Approval Number - 02-02	d. Discrepancy Indication Space:
I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.		
e. Name of Authorized Agent (Print)	f. Signature	g. Date

IV. ASBESTOS (Generator completes IVa-f and Operator complete IVg-i)

a. Operator's Name and Address: THIS SECTION IS NOT APPLICABLE (NOT ASBESTOS) b. Phone:	c. Responsible Agency Name and Address: THIS SECTION IS NOT APPLICABLE (NOT ASBESTOS) d. Phone:	
e. Special Handling Instructions and Additional Information:		
f. <input type="checkbox"/> Friable <input type="checkbox"/> Non-Friable <input type="checkbox"/> Both % Friable % Non-Friable		
OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.		
g. Operator's Name and Title (Print)	h. Signature	i. Date
*Operator refers to the company which owns, leases, operates, controls, or supervises the facility being demolished or renovated, or the demolition or renovation operation or both		



NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

If waste is asbestos waste, complete Sections I, II, III and IV
If waste is **NOT** asbestos waste, complete Sections I, II and III

I. GENERATOR (Generator completes Ia-s)

a. Generator's US EPA ID Number		b. Manifest Document Number		c. Page 1 of 1		
d. Generator's Information: USEPA – SK Handtools Site 135 Hickory Street Defiance, OH 43512 f. Phone: 734-692-7685 h. County of Site Location: Defiance County, OH Generator site location (if different):			e. Billing Information: (Billing/Pricing is handled between Environmental Quality Management & the Republic Roll-Off Hauling Division) g. Phone: 513-309-3062 (Environmental Quality Management)			
i. Site Location:			j. Phone No.:			
k. Waste Profile #	l. Exp. Date	m. Waste Shipping Name and Description	n. Containers No.	Type	o. Total Quantity	p. Unit Wt/Vol
3764 12 9433	6 / 6 / 2013	RCRA Empty Containers and Debris		Roll-Off		
3764 12 9816	6 / 7 / 2013	Floor Sweepings and Debris	1	Roll-Off	30	YD
GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if this waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions. I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR 268 and is no longer a hazardous waste as defined by 40 CFR 261.						
X		X		6-19-12		
q. Generator Authorized Agent Name (Print)		r. Signature		s. Date		

II. TRANSPORTER (Generator completes IIa-b and Transporter completes IIc-e)

a. Transporter's Name and Address: National Serv-All Hauling Division 6231 MacBeth Road Fort Wayne, IN 46809 b. Phone: 260-478-0377		
c. Driver Name (Print) 	d. Signature 	e. Date 6-19-12

III. DESTINATION (Generator complete IIIa-c and Destination Site completes IIId-g)

a. Disposal Facility and Site Address: National Serv-All Landfill (Republic Services) 6231 MacBeth Road Fort Wayne, IN 46809 (Allen County) b. Phone: 260-478-0374		c. US EPA Number – N/A IDEM Approval Number – 02-02	d. Discrepancy Indication Space:
I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.			
e. Name of Authorized Agent (Print)	f. Signature	g. Date	

IV. ASBESTOS (Generator completes IVa-f and Operator complete IVg-i)

a. Operator's Name and Address: THIS SECTION IS NOT APPLICABLE (NOT ASBESTOS)		c. Responsible Agency Name and Address: THIS SECTION IS NOT APPLICABLE (NOT ASBESTOS)	
b. Phone:		d. Phone:	
e. Special Handling Instructions and Additional Information: f. <input type="checkbox"/> Friable <input type="checkbox"/> Non-Friable <input type="checkbox"/> Both % Friable % Non-Friable			
OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.			
g. Operator's Name and Title (Print)		h. Signature	
i. Date			
*Operator refers to the company which owns, leases, operates, controls, or supervises the facility being demolished or renovated, or the demolition or renovation operation or both			

ENCLOSURE 4
HAZCAT SPREADSHEETS
(8 Pages)

USEPA/SK HAND TOOLS DRUM LOG

[illegible]

USEPA/SK HAND TOOLS DRUM LOG

Drum #	Type	Size	Vol	Liq/SI/Sol	Color	pH	FL	CI	Ox	S	CN	Waste Stream	Comments
1	Steel	55	55	liq	black		p	n				Flammable Liquids	
2	Steel	55	55	liq	black		p	n				Flammable Liquids	
3	Steel	55	55	liq	brown		p	n				Flammable Liquids	
10	Poly	55	55	liq	yellow		p	n				Flammable Liquids	
13	Poly	15	15	liq	white							Flammable Liquids	
16	Steel	1	1									Flammable Liquids	
17	Steel	1	1									Flammable Liquids	
18	Steel	1	1									Flammable Liquids	
20	Steel	5	0	liq	clear		p	n				Flammable Liquids	Safety can
26	Poly	15	1	liq		8	n					Flammable Liquids	
44	Steel	5	5	liq	brown		p					Flammable Liquids	
47	Steel	5	5	liq	clear		p					Flammable Liquids	
50	Poly	55	55	liq	clear		p					Flammable Liquids	
51	Steel	5	2	liq	red		p					Flammable Liquids	
57	Steel	15	15	liq	brown	7	p					Flammable Liquids	
59	Steel	15	30	liq	brown		p					Flammable Liquids	
60	Steel	30	20	liq	red		p					Flammable Liquids	
61	Steel	55	55	liq	yellow		p					Flammable Liquids	
62	Steel	55	15	liq	yellow	5	c					Flammable Liquids	
65	Steel	55	55	liq	red	5	p					Flammable Liquids	Mobil areo hf hydro fluid
67	Steel	55	40	liq	clear	5	p					Flammable Liquids	
68	Steel	55	55	liq	clear	5	p					Flammable Liquids	gear oil
69	Poly	55	40	liq	red		p					Flammable Liquids	
70	Poly	30	20	liq	red		p					Flammable Liquids	
72	Poly	55	35	liq	red		p					Flammable Liquids	
73	Poly	55	13	liq			p					Flammable Liquids	
74	Steel	55	13	liq	black		n					Flammable Liquids	oil
76	Steel	30	15	liq	red		p					Flammable Liquids	
77	Steel	55	39	liq	brown		p					Flammable Liquids	oil
82	Poly	55	10	liq	red		p					Flammable Liquids	
104	Poly	5	5	liq	yellow							Flammable Liquids	
105	Poly	5	4	liq	brown		p					Flammable Liquids	
108	Poly	5	2	solid	black		p					Flammable Liquids	
112	Poly	55	40	liq	brown	8	F					Flammable Liquids	used oil
115	Steel	55	55	liq	clear	5	n/p					Flammable Liquids	Lubes
118	Steel	55	35	liq	black		p					Flammable Liquids	
119	Steel	55	55	liq	black		p					Flammable Liquids	
120	Steel	55	55	liq	brown		p					Flammable Liquids	
121	Steel	55	38	liq	clear		p					Flammable Liquids	EMD oil
122	Steel	55	38	liq	black		p					Flammable Liquids	
123	Steel	55	38	liq	black		p					Flammable Liquids	
124	Steel	55	38	liq	clear		p					Flammable Liquids	
125	Steel	55	55	liq	clear		p					Flammable Liquids	
126	Steel	55	55	liq	black	5	p					Flammable Liquids	
127	Steel	55	55	liq	black	5	p					Flammable Liquids	
132	Steel	55	55	liq	black		p					Flammable Liquids	
134	Steel	55	55	liq	black		n					Flammable Liquids	
135	Steel	55	38	liq	black		p					Flammable Liquids	
136	Steel	55	55	liq	brown		p					Flammable Liquids	
141	Poly	55	38	liq	red		p					Flammable Liquids	
142	Poly	5	1	liq	brown		p					Flammable Liquids	

USEPA/SK HAND TOOLS DRUM LOG

Drum #	Type	Size	Vol	Liq/SI/Sol	Color	pH	FL	CI	Ox	S	CN	Waste Stream	Comments
144	Steel	55	38	liq	black	5	n					Flammable Liquids	
145	Steel	55	55	liq	clear	5	p					Flammable Liquids	
146	Steel	55	55	liq	brown		p					Flammable Liquids	
147	Steel	55	5	liq	clear		p					Flammable Liquids	
150	Steel	55	55	liq	black		p					Flammable Liquids	
151	Poly	55	55	liq	black		p					Flammable Liquids	
152	Poly	5	2	liq	black		p					Flammable Liquids	
153	Poly	55	38	liq	brown		p					Flammable Liquids	
154	Poly	5	1	liq	black		p					Flammable Liquids	
155	Steel	55	55	liq	black		p					Flammable Liquids	
156	Steel	55	27	liq	black		p					Flammable Liquids	
157	Steel	55	5	liq	brown		p					Flammable Liquids	
158	Poly	5	1	liq	black		p					Flammable Liquids	
160	Steel	55	5	liq	brown		p					Flammable Liquids	
162	Steel	3	3	liq	black		p					Flammable Liquids	
164	Poly	5	4	liq	black		p					Flammable Liquids	
165	Poly	55	15	liq	black		p					Flammable Liquids	
166	Steel	55	27	liq	purple		p					Flammable Liquids	
167	Steel	55	15	liq	black		p					Flammable Liquids	
169	Poly	16	2	liq	orange	8	n					Flammable Liquids	
172	Poly	16	2	liq	clear		p					Flammable Liquids	
174	Steel	5	3	liq	black		p					Flammable Liquids	
175	Steel	5	5	liq	black	8	p					Flammable Liquids	
176	Steel	5	1	liq	black		p	p				Flammable Liquids	
177	Poly	5	2	liq	brown		p					Flammable Liquids	
178	Steel	5	4	liq	brown		p					Flammable Liquids	
183	Steel	5	1	liq	yellow		p					Flammable Liquids	
186	Poly	7	5	liq	brown		p					Flammable Liquids	
187	Poly	5	1	liq	clear		p					Flammable Liquids	
190	Poly	5	4	liq	clear		p					Flammable Liquids	
203	Steel	5	5	liq	clear		p					Flammable Liquids	
206	Poly	5	2	liq	clear		p					Flammable Liquids	
212	Steel	5	3	liq	brown		p					Flammable Liquids	
213	Poly	5	1	liq	red		p					Flammable Liquids	
214	Poly	3	1	liq	brown		p					Flammable Liquids	
217	Poly	5	1	liq	brown	8	p					Flammable Liquids	
220	Poly	5	5	liq	black		p					Flammable Liquids	
221	Poly	5	1	liq	red	7	p					Flammable Liquids	
222	Steel	85	15	liq	black		p					Flammable Liquids	
223	Poly	5	1	liq	white		p					Flammable Liquids	
224	Steel	55	38	liq	black	6	p					Flammable Liquids	
225	Steel	55	55	liq	brown		p					Flammable Liquids	
226	Steel	42	42	liq	black		p					Flammable Liquids	
228	Steel	55	55	liq	black		p					Flammable Liquids	
232	Poly	55	55	liq	black		p					Flammable Liquids	
233	Poly	55	27	liq	black		p					Flammable Liquids	
234	Poly	55	55	liq	black	6	n					Flammable Liquids	
235	Steel	55	55	liq	black		p					Flammable Liquids	
236	Poly	55	55	liq	black		p					Flammable Liquids	
237	Poly	55	55	liq	black		p					Flammable Liquids	
238	Poly	55	55	liq	black		p					Flammable Liquids	

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Drum #	Type	Size	Vol	Liq/SI/Sol	Color	pH	FL	CI	Ox	S	CN	Waste Stream	Comments
4	Steel	55		liq	clear	6						Neutral Liquids	
25	Poly	15	15	liq	clear	4	n					Neutral Liquids	
27	Poly	5	0	liq	clear	6	n					Neutral Liquids	Nalco 1720
28	Poly	5	4	liq	clear	6	p					Neutral Liquids	
30	Poly	15	4	liq	clear	5	n					Neutral Liquids	
31	Poly	5	1	liq	clear	5	n					Neutral Liquids	NexGuard® 22350
32	Poly	15	1	liq	clear	5	n					Neutral Liquids	
35	Poly	5	3	liq	green	8	n					Neutral Liquids	
40	Poly	5	3	liq	yellow	8	n					Neutral Liquids	
41	Poly	15	4	liq	orange	10	n					Neutral Liquids	
45	Poly	5	3	liq	brown	8	n					Neutral Liquids	Nalco boiler treatment
46	Poly	5	4	liq	brown	8	n					Neutral Liquids	
48	Poly	5	3	liq	black	8	n					Neutral Liquids	
49	Poly	5	5	liq	brown	1	n					Neutral Liquids	Disinfectant/germicide
53	Poly	55	55	liq	brown	6	n					Neutral Liquids	ind. Microbiocide
54	Poly	55	55	liq	brown	6	n					Neutral Liquids	Haz waste liq
55	Poly	55	55	liq	brown	5	n					Neutral Liquids	Haz waste liq
66	Steel	55	55	liq	clear	5	n					Neutral Liquids	Haz waste liq
71	Steel	15	4	liq	brown	8	n					Neutral Liquids	
75	Steel	55	27	liq	clear	10	n					Neutral Liquids	
78	Poly	55	40	liq	clear	5	n					Neutral Liquids	
79	Poly	55	40	liq	clear	5	n					Neutral Liquids	
80	Poly	55	27	liq	clear	5	n					Neutral Liquids	
81	Poly	30	4	liq	clear	5	n					Neutral Liquids	
83	Poly	55	27	liq	clear	5	n					Neutral Liquids	
84	Steel	55	55	liq	clear	5	n					Neutral Liquids	
85	Steel	55	34	liq	clear	5	n					Neutral Liquids	
86	Steel	55	55	liq	clear	5	n					Neutral Liquids	
87	Steel	55	55	liq	clear	5	n					Neutral Liquids	
88	Steel	55	55	liq	clear	5	n					Neutral Liquids	
89	Steel	55	55	liq	clear	5	n					Neutral Liquids	
90	Steel	55	55	liq	clear	5	n					Neutral Liquids	
91	Steel	55	40	liq	clear	5	n					Neutral Liquids	
92	Poly	55	55	liq	clear	5	n					Neutral Liquids	
94	Poly	55	55	liq	clear	5	n					Neutral Liquids	
95	Poly	55	40	liq	clear	5	n					Neutral Liquids	
96	Steel	55	40	liq	black	5	n					Neutral Liquids	
97	Steel	55	40	liq	orange	5	n					Neutral Liquids	
98	Steel	55	55	liq	clear	5	n					Neutral Liquids	oil
99	Steel	55	55	liq	clear	5	n					Neutral Liquids	
100	Steel	55	55	liq	clear	5	n					Neutral Liquids	
101	Steel	55	55	liq	clear	5	F					Neutral Liquids	
102	Poly	55	55	liq	clear	5	n					Neutral Liquids	
109	Poly	5	1	liq	clear	6	n					Neutral Liquids	
110	Poly	5	5	liq	brown	5	p					Neutral Liquids	
113	Poly	55	10	liq	black	8	n					Neutral Liquids	
114	Steel	55	55	liq	clear	5	n					Neutral Liquids	
116	Steel	55	55	liq	clear	5	n					Neutral Liquids	Lubes
117	Steel	55	55	liq	clear	5	n					Neutral Liquids	Lubes
128	Steel	55	38	liq	clear	5	n					Neutral Liquids	Lubes
129	Steel	55	38	liq	clear	5	n					Neutral Liquids	

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